EXHIBIT D

	Case 3.17-cv-00939-WHA Document 1500-	-5 Filed 09/14/17 Page 2 01 40	
1 2 3 4 5 6 7 8	MICHAEL A. JACOBS (CA SBN 111664) MJacobs@mofo.com ARTURO J. GONZÁLEZ (CA SBN 121490) AGonzalez@mofo.com MORRISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 Telephone: 415.268.7000 Facsimile: 415.268.7522 KAREN L. DUNN (Pro Hac Vice) kdunn@bsfllp.com HAMISH P.M. HUME (Pro Hac Vice) hhume@bsfllp.com BOIES SCHILLER FLEXNER LLP 1401 New York Avenue, N.W. Washington DC 20005		
10	Telephone: 202.237.2727 Facsimile: 202.237.6131		
11 12 13 14	WILLIAM CARMODY (<i>Pro Hac Vice</i>) bcarmody@susmangodfrey.com SHAWN RABIN (<i>Pro Hac Vice</i>) srabin@SusmanGodfrey.com SUSMAN GODFREY LLP 1301 Avenue of the Americas, 32nd Floor New York, NY 10019-6023		
15 16	Attorneys for Defendants UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC		
17	UNITED STATES	DISTRICT COURT	
18	NORTHERN DISTRI	CT OF CALIFORNIA	
19	SAN FRANCIS	SCO DIVISION	
20			
21	WAYMO LLC,	Case No. 3:17-cv-00939-WHA	
22	Plaintiff,	DEFENDANTS UBER TECHNOLOGIES,	
23	V.	INC. AND OTTOMOTTO LLC'S SUPPLEMENTAL INITIAL	
24	UBER TECHNOLOGIES, INC.,	DISCLOSURES	
25	OTTOMOTTO LLC; OTŤO TRÚCKING LLC,	Judge: Honorable William H. Alsup	
26	Defendants.	Trial Date: October 10, 2017	
27			
28			

PRELIMINARY STATEMENT

Pursuant to Federal Rules of Civil Procedure 26(a)(1), Defendants Uber Technologies, Inc. ("Uber") and Ottomotto LLC ("Ottomotto") (collectively, "Defendants") hereby supplement their initial disclosures to Plaintiff Waymo LLC.

Defendants provide these disclosures subject to and without waiving any applicable privilege, doctrine, or right, including without limitation the attorney-client privilege, the joint defense/common interest privilege, the work product doctrine, and all other rights and privileges recognized under the laws of the United States, the State of California, and all relevant jurisdictions. By these disclosures, Defendants do not concede the relevance or admissibility of any particular information. Defendants make these disclosures based on information currently available to them. Defendants reserve the right to amend or supplement these disclosures and to present additional evidence to support their defenses with any filing or during any proceeding in this action, including trial, in accordance with the Court's Case Management Order (Dkt. 562).

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION [Fed. R. Civ. P. 26(a)(1)(A)(i)]

Defendants identify the following individuals who may have discoverable information that Defendants may use to support their defenses in this case. Waymo¹ should contact any current or former employee, agent, or other representative of Defendants only through Defendants' counsel of record, unless otherwise specified. Additionally, individuals described as having knowledge of the "Stroz due diligence for the Uber/Ottomotto acquisition" are noted with an asterisk (*) because these individuals would be used to support Defendants' defenses in this case, or would testify about that subject, if and only if that subject is found not to be privileged.

¹ "Waymo" refers to Waymo LLC (previously Project Chauffeur), Google Inc., and Alphabet Inc.

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1	n.	A 11	17 1 1
1	Persons	Address	Knowledge
2	Travis Kalanick	[Contact through counsel of record]	Defendants' business model and strategy for autonomous
3		Uber Technologies, Inc.	vehicles; Defendants' non- misappropriation of
4		1455 Market Street, Floor 4 San Francisco, CA 94103	Waymo's trade secrets; Uber's decision to acquire
5			Ottomotto; steps taken by Defendants to prevent trade
6			secrets from prior employers coming to Defendants;
7			Defendants' autonomous vehicle program;
8			March 11, 2016 meeting with Anthony Levandowski;
9			knowledge of Waymo's discussions with Defendants
10			regarding a partnership with Defendants in the self-
11			driving vehicle/ride-sharing space; Defendants'
12			employment of Anthony Levandowski; Defendants'
13			termination of Anthony Levandowski
14	Jeff Holden	[Contact through counsel of record]	Defendants' business model and strategy for autonomous
15		Uber Technologies, Inc.	vehicles; Defendants' autonomous vehicle
16		1455 Market Street, Floor 4	program; Uber's decision to
17		San Francisco, CA 94103	acquire Ottomotto; confirmation of the absence
18			of evidence of trade secret misappropriation through
19			and during compliance with the Court's provisional
20			remedy order
21			

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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Persons	Address	Knowledge
Anthony Levandowski	Contact Mr. Levandowski's counsel: Ismail Ramsey or Miles Ehrlich Ramsey & Ehrlich LLP 803 Hearst Avenue Berkeley, CA 94710	Nature of employment at Waymo and Defendants; design and development of Defendants' LiDAR; Defendants' autonomous vehicle program; Defendants' non-misappropriation of Waymo's trade secrets; the inventions disclosed and claimed in the '922 and '464 patents, including conception and reduction to practice; the preparation and filing of the '922 and '464 patents; business of Otto Trucking LLC; knowledge of Odin Wave LLC and Tyto LiDAR LLC; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; March 11, 2016 meeting with Anthony Levandowski; Stroz due diligence for the Uber/Ottomotto acquisition
Radu Raduta	Contact Mr. Raduta's counsel: Mary McNamara Swanson & McNamara LLP 300 Montgomery Street, Suite 1100 San Francisco, CA 94104 Phone: (415) 477-3800 Fax: (415) 477-9010 Email: mary@smllp.law	Nature of employment at Waymo and Defendants; Defendants' non- misappropriation of Waymo's trade secrets

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1	Persons	Address	Knowledge
2	Sameer Kshirsagar	Contact Mr. Kshirsagar's counsel:	Nature of employment at Waymo and Defendants;
3		Mark Punzalan	Defendants' non-
4		Punzalan Law, P.C.	misappropriation of Waymo's trade secrets
		600 Allerton Street, Suite 201	
5		Redwood City, CA 94063 Phone: (650) 481-8112	
6		Fax: (650) 362-4151	
7		Email: markp@punzalanlaw.com	
8	James Haslim	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
9		Uber Technologies, Inc. 1455 Market Street, Floor 4	Defendants' non- misappropriation of
)		San Francisco, CA 94103	Waymo's trade secrets; knowledge of Odin
1			Wave LLC and Tyto LiDAR LLC; confirmation
2			of the absence of evidence of trade secret misappropriation through and during
3			compliance with the Court's provisional remedy order
14 15	Adam Kenvarg	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
6		Uber Technologies, Inc. 1455 Market Street, Floor 4	Defendants' non- misappropriation of
7		San Francisco, CA 94103	Waymo's trade secrets; confirmation of the absence of evidence of trade secret
8			misappropriation through and during compliance with
9			the Court's provisional remedy order; inspection
0			pursuant to the Court's provisional remedy order
1	William Treichler	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
2		Uber Technologies, Inc.	Defendants' non-
3		1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
4		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
5			misappropriation through and during compliance with
26			the Court's provisional remedy order
27			

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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1	Persons	Address	Knowledge
2 3 4 5 6 7	Florin Ignatescu	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
8 9 10 11 12 13 14 15 16 17 18 19	Gaetan Pennecot	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; the inventions disclosed and claimed in the '922 and '464 patents, including conception and reduction to practice; the preparation and filing of the '922 and '464 patents; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
18			absence of evidence of tra secret misappropriation through and during compliance with the Cour

DEFENDANTS' UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S SUPPLEMENTAL INITIAL DISCLOSURES

1	Persons	Address	Knowledge
2	Daniel Gruver	[Contact through counsel of record]	Design and development of
3		Uber Technologies, Inc.	Defendants' LiDAR; Defendants' non-
4		1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets; the
5		San Francisco, CA 94103	inventions disclosed and claimed in the '922 and
6			'464 patents, including conception and reduction to
7			practice; the preparation and filing of the '922 and
8			'464 patents; nature of employment at Waymo; Waymo's employee policies
9			concerning confidential and trade secret information,
10			including with respect to
11			hardware; knowledge of the Project Chauffeur bonus
12			program; confirmation of the absence of evidence of trade secret misappropriation
13			through and during compliance with the Court's
14			provisional remedy order
15	Scott Boehmke	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
16		Uber Technologies, Inc.	Defendants' non- misappropriation of
17		Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Waymo's trade secrets; inspection pursuant to the
18		100 32114 80, 1100001311, 111 10201	Court's provisional remedy order; confirmation of the
19			absence of evidence of trade secret misappropriation
20			through and during
21			compliance with the Court's provisional remedy order
22	Jim Gasbarro	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
23		Uber Technologies, Inc.	Defendants' non- misappropriation of
24		Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Waymo's trade secrets; confirmation of the absence
		100 32nd 5t, 1 htsburgh, 1 A 13201	of evidence of trade secret
25			misappropriation through and during compliance with
26			the Court's provisional remedy order
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1	Persons	Address	Knowledge
2 3 4 5 6 7	Robert Doll	[Contact through counsel of record] Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
8 9 10 11 12 13 14 15 16 17 18	Eric Meyhofer	[Contact through counsel of record] Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' autonomous vehicle program; Defendants' nonmisappropriation of Waymo's trade secrets; Defendants' business model and strategy for autonomous vehicles; Uber's decision to acquire Ottomotto; termination of Anthony Levandowski; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order; steps taken by Defendants to prevent trade secrets from prior employers of Defendants' employees coming to Defendants

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

1	Persons	Address	Knowledge
2	John Bares	[Contact through counsel of record]	Design and development of
3		I II and Tarahanahan ing I	Defendants' LiDAR; Defendants' autonomous
4		Uber Technologies, Inc. Advanced Technologies Center	vehicle program; Defendants' non-
		100 32nd St, Pittsburgh, PA 15201	misappropriation of Waymo's trade secrets;
5 6			Defendants' business model and strategy for autonomous
7			vehicles; Über's decision to acquire Ottomotto; steps taken by Defendants to
8			prevent trade secrets from prior employers of
9			Defendants' employees coming to Defendants;
10			confirmation of the absence of evidence of trade secret
11			misappropriation through and during compliance with
12			the Court's provisional remedy order
13	Asheem Linaval	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
14		Uber Technologies, Inc.	Defendants' non-
15		1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
16		San Francisco, CA 94103	Waymo's policies as it relates to contractors
17			concerning confidential and trade secret information;
18			confirmation of the absence of evidence of trade secret
19			misappropriation through and during compliance with the Court's provisional
20			remedy order
21	Michael Karasoff	[Contact through counsel of record]	Design and development of Defendants' LiDAR;
22		Uber Technologies, Inc.	Defendants' non-
23		1455 Market Street, Floor 4 San Francisco, CA 94103	misappropriation of Waymo's trade secrets;
24		San Francisco, CA 94103	knowledge of Odin Wave LLC and Tyto
25			LiDAR LLC; confirmation of the absence of evidence of
26			trade secret misappropriation through and during
27			compliance with the Court's provisional remedy order
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Persons	Address	Knowledge
Matthew Palomar	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Daniel Ratner	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Max Levandowski	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
George Lagui	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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1	Persons	Address	Knowledge
2	Lior Ron	[Contact through counsel of record]	Nature of employment at
3			Waymo and Defendants; Anthony Levandowski's
		Uber Technologies, Inc. 1455 Market Street, Floor 4	departure from Waymo;
4		San Francisco, CA 94103	Waymo's policies surrounding side projects and
5			side businesses; knowledge of Waymo employee
6			involvement in side projects and side businesses,
7			including that of Anthony
8			Levandowski; knowledge of the Project Chauffeur bonus
9			program; steps taken by Defendants to prevent trade
			secrets from prior employers
10			of Defendants' employees coming to Defendants;
11			Defendants' non- misappropriation of
12			Waymo's trade secrets;
13			formation, purpose, and business of Otto
14			Trucking LLC; formation, purpose, and business of
			Ottomotto; Ottomotto's
15			decision to be acquired by Uber; March 11, 2016
16			meeting with Anthony Levandowski; Stroz due
17			diligence for the Uber/Ottomotto acquisition*;
18			confirmation of the absence
19			of evidence of trade secret misappropriation through
20			and during compliance with the Court's provisional
			remedy order; design and
21			development of Ottomotto's LiDAR;
22	Brent Schwarz	[Contact through counsel of record]	Defendants' non-
23		Uber Technologies, Inc.	misappropriation of Waymo's trade secrets;
24		1455 Market Street, Floor 4	knowledge of Odin Wave LLC and Tyto LiDAR LLC;
25		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
26			misappropriation through and during compliance with
27			the Court's provisional remedy order
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Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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Persons	Address	Knowledge
Cameron Poetzscher	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Defendants' non- misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due
		diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Nina Qi	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; March 11, 2016 meeting with Anthony Levandowski; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

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1	Dawsans	Adduoss	Unawladga
	Persons	Address	Knowledge
2	Adam Bentley	[Contact through counsel of record]	Formation, purpose, and business of Otto
3		Uber Technologies, Inc.	Trucking LLC; formation, purpose, and business of
4		1455 Market Street, Floor 4 San Francisco, CA 94103	Ottomotto; Ottomotto's decision to be acquired by
5		Suil Funcisco, Cri 74105	Defendants and structure of the acquisition; knowledge
6			of Odin Wave LLC and Tyto LiDAR LLC; submissions to
7			the Nevada Department of Motor Vehicles; Stroz due
8			diligence for the Uber/Ottomotto acquisition*; confirmation of the absence
9			of evidence of trade secret misappropriation through
10			and during compliance with the Court's provisional
11			remedy order
12	Ognen Stojanovski	[Contact through counsel of record]	Knowledge of Odin Wave LLC, Tyto
13		Uber Technologies, Inc.	LiDAR LLC, and Sandstone Group LLC; confirmation of
14		1455 Market Street, Floor 4 San Francisco, CA 94103	the absence of evidence of trade secret misappropriation
15 16			through and during compliance with the Court's provisional remedy order
17	Rhian Morgan	[Contact through counsel of record]	Hiring and onboarding
18		Uber Technologies, Inc.	process for Ottomotto, including hiring agreements; steps taken by Defendants to
19		1455 Market Street, Floor 4	prevent trade secrets from
20		San Francisco, CA 94103	prior employers of Defendants' employees
21			coming to Defendants; confirmation of the absence of evidence of trade secret
22			misappropriation through and during compliance with
23			the Court's provisional remedy order
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Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

1	Dawsans	Adduses	Vuovilodas
	Persons Den Dyrmette	Address [Contact through counsel of record]	Knowledge Noture of omployment at
2	Don Burnette	[Contact through counsel of record]	Nature of employment at Waymo and Defendants;
3		Uber Technologies, Inc. 1455 Market Street, Floor 4	Defendants' non- misappropriation of
4		San Francisco, CA 94103	Waymo's trade secrets; formation, purpose, and
5			business of Ottomotto; Ottomotto's decision to be
6			acquired by Defendants; Development and operation
7			of Waymo's autonomous vehicle program; Anthony
8			Levandowski's departure from Waymo; Waymo's
9			policies surrounding side projects and side businesses;
10			knowledge of Waymo employee involvement in
11			side projects and side businesses; knowledge of the
12			Project Chauffeur bonus program; Stroz due diligence
13			for the Uber/Ottomotto acquisition*; confirmation of
14			the absence of evidence of trade secret misappropriation
15			through and during compliance with the Court's
16	C 1 1 1%		provisional remedy order
17	Soren Juelsgaard*	[Contact through counsel of record]	Stroz due diligence for the Uber/Ottomotto acquisition*; Defendants' non-
18		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of
19		San Francisco, CA 94103	Waymo's trade secrets; confirmation of the absence
20			of evidence of trade secret misappropriation through
21			and during compliance with the Court's provisional
22	Colin Sebern*	[Contact through counsel of record]	remedy order Stroz due diligence for the
23			Uber/Ottomotto acquisition*; Defendants' non-
24		Uber Technologies, Inc. 1455 Market Street, Floor 4	misappropriation of Waymo's trade secrets;
25		San Francisco, CA 94103	confirmation of the absence of evidence of trade secret
26			misappropriation through and during compliance with
27			the Court's provisional remedy order
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Persons	Address	Knowledge
Brian McClendon	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Development and operation of Waymo's autonomous vehicle program; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; knowledge of the Project Chauffeur bonus program; introduction of Anthony Levandowski to Defendants; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Justin Suhr	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Stroz due diligence for the Uber/Ottomotto acquisition*; Uber's decision to acquire Ottomotto and structure of the acquisition; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Angela Padilla	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Termination of Anthony Levandowski; Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order; Anthony Levandowski's claim that he downloaded and retained alleged misappropriated materials to facilitate bonus payment(s) from Waymo

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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Persons	Address	Knowledge
Andrew Glickman	[Contact through counsel of record] Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Stroz due diligence for the Uber/Ottomotto acquisition*; Uber's decision to acquire Ottomotto and structure of the acquisition; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Eric Friedberg*	Stroz Friedberg 32 Avenue of the Americas, Floor 4 New York, NY 10013 Phone: (212) 981-6540	Stroz due diligence for the Uber/Ottomotto acquisition*
Mary Fulginiti*	Stroz Friedberg 1925 Century Park, East Suite 1350 Los Angeles, CA 90067 Phone: (310) 623-3300	Stroz due diligence for the Uber/Ottomotto acquisition*
Judith Branham*	Stroz Friedberg 330 Second Avenue South, Suite 335 Minneapolis, MN 55401 Phone: (612) 605-3000	Stroz due diligence for the Uber/Ottomotto acquisition*
Melanie Maugeri*	Stroz Friedberg 101 Montgomery Street, Suite 2200 San Francisco, CA 94104 Phone: (415) 671-4720	Stroz due diligence for the Uber/Ottomotto acquisition*
Eric Amdursky*	[Contact through O'Melveny and Myers LLP General Counsel] Martin S. Checov O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 Phone: (415) 984-8713	Stroz due diligence for the Uber/Ottomotto acquisition*
Paul Sieben*	[Contact through O'Melveny and Myers LLP General Counsel] Martin S. Checov O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 Phone: (415) 984-8713	Stroz due diligence for the Uber/Ottomotto acquisition*

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

Persons	Address	Knowledge
Eric Tate† ²	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105 Phone: (415) 268-7000	Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Rudy Kim†	Morrison & Foerster LLP 755 Page Mill Road Palo Alto, CA 94304 Phone: (650) 813-5600	Intellectual property due diligence for the Uber/Ottomotto acquisition*; inspection pursuant to the Court's provisional remedy order
Shouvik Biswas*†	Morrison & Foerster LLP 1650 Tysons Boulevard, Suite 400 McLean, VA 22102 Phone: (703) 760-7700	Intellectual property due diligence for the Uber/Ottomotto acquisition*
Vendy Ray†	Morrison & Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017-3543 Phone: (213) 892-5200	Confirmation of the absence of evidence of trade secret misappropriation; inspection pursuant to the Court's provisional remedy order
Daniel Muino†	Morrison & Foerster LLP 2000 Pennsylvania Avenue, NW Suite 6000 Washington, D.C. 20006 Phone: (202) 887-1500	Inspection pursuant to the Court's provisional remedy order
Esther Kim Chang†	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105 Phone: (415) 268-7000	Inspection pursuant to the Court's provisional remedy order
Sylvia Rivera†	Morrison & Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017-3543 Phone: (213) 892-5200	Confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

² In view of the rapid pace of this litigation and the Court's order requiring initial disclosures by June 21, 2017, Defendants are listing certain outside counsel as potential witnesses out of an abundance of caution. Such outside counsel are indicated with †. Defendants expect to resolve, through resolution of pending privilege issues and discussions with opposing counsel and the Court, whether any of these potential witnesses will in fact be called as witnesses at trial.

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1	Persons	Address	Knowledge
2	Kevin Faulkner	Stroz Friedberg 32 Avenue of the Americas, Floor 4	Forensic examination of Uber-issued devices and
3		New York, NY 10013	data; confirmation of the absence of evidence of trade
4		Phone: (212) 981-6540	secret misappropriation through and during
5			compliance with the Court's provisional remedy order
6	John Krafcik	Waymo LLC	Development and operation
7		1600 Amphitheatre Parkway Mountain View, CA 94043	of Waymo's autonomous vehicle program; Anthony
8		Wountain View, CA 94043	Levandowski's departure from Waymo; Waymo's
9			policies surrounding side projects and side businesses;
10			knowledge of Waymo employee involvement in
11			side projects and side businesses, including that of
12			Anthony Levandowski; Waymo's business plans;
13			knowledge of discussions with Defendants regarding a
14			partnership with Defendants in the self-driving
15			vehicle/ride-sharing space; knowledge of the Project
16			Chauffeur bonus program;

1	Persons	Address	Knowledge
2	Pierre-Yves Droz	Waymo LLC	Inventions disclosed and
3		1600 Amphitheatre Parkway	claimed in the '922, '464, and '936 patents, including
		Mountain View, CA 94043	conception and reduction to
5			practice; the preparation and filing of the '922, '464, and '936 patents; Waymo's
6			employee policies concerning confidential and trade secret information,
7			including with respect to hardware; the design,
8			development, and operation
9			of Waymo's LiDAR systems, self-driving car project, and purported trade
10			secrets; whether and to what extent the allegedly
11			misappropriated files contain Waymo's alleged trade
12			secrets; Waymo's awareness of the extent to which each
13			of the alleged Waymo trade secrets selected for trial other
14			than trade secret 25, or elements thereof, are known
15			or practiced outside of Waymo; Waymo's
16	Will: M.C	W IIC	knowledge of Odin Wave
17 18	William McCann	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving
19			car project, and purported trade secrets; Waymo's employee policies
20			concerning confidential and trade secret information
21	Ben Ingram	Waymo LLC	Design, development, and operation of Waymo's
22		1600 Amphitheatre Parkway Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
23			trade secrets; Waymo's employee policies
24			concerning confidential and trade secret information;
25			Waymo's awareness of the extent to which alleged
26			Waymo trade secret 25, or
27			elements thereof, is known or practiced outside of Waymo
28			Wayiio

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

1	Persons	Address	Knowledge
2 3	Bernard Fidric	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's LiDAR systems, self-driving
4		Mountain View, CA 94043	car project, and purported trade secrets; Waymo's
5			employee policies concerning confidential and trade secret information
6	Luke Wachter	Waymo LLC	Design, development, and
7		1600 Amphitheatre Parkway Mountain View, CA 94043	operation of Waymo's LiDAR systems, self-driving car project, and purported
8			trade secrets; Waymo's employee policies
9			concerning confidential and trade secret information
11	Dmitri Dolgov	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
12		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
13			trade secrets; Waymo's employee policies
14			concerning confidential and trade secret information; Waymo's policies
15			surrounding side projects and side businesses; knowledge
16			of Waymo employee involvement in side projects
17			and side businesses, including that of Anthony
18 19			Levandowski; knowledge of the Project Chauffeur bonus program
20	Nathaniel Fairfield	Waymo LLC	Design, development, and operation of Waymo's
21		1600 Amphitheatre Parkway Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
22			trade secrets; Waymo's employee policies
23			concerning confidential and trade secret information;
24			Waymo's policies surrounding side projects and
25			side businesses; knowledge of Waymo employee
26			involvement in side projects and side businesses,
27			including that of Anthony Levandowski
28			

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

1	Persons	Address	Knowledge
2	Andrew Chatham	Waymo LLC	Design, development, and
3		1600 Amphitheatre Parkway Mountain View, CA 94043	operation of Waymo's LiDAR systems, self-driving
4		Mountain view, CA 94043	car project, and purported trade secrets; Waymo's
5			employee policies concerning confidential and
6			trade secret information; Waymo's policies surrounding side projects and
7			side businesses; knowledge
8			of Waymo employee involvement in side projects and side businesses,
9			including that of Anthony Levandowski
10	Rahim Pardhan	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
11		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
12			trade secrets; Waymo's employee policies
14			concerning confidential and trade secret information
15	Blaise Gassend	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
16		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
17			trade secrets; Waymo's employee policies concerning confidential and
18			trade secret information
19	Mark Shand	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
20		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
21			trade secrets; Waymo's employee policies
22			concerning confidential and trade secret information;
23			Waymo's policies surrounding side projects and
24			side businesses; knowledge of Waymo employee
25			involvement in side projects and side businesses,
26			including that of Anthony Levandowski
27			

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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1	Persons	Address	Knowledge
2	Andrew Schultz	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
3		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
4			trade secrets; Waymo's employee policies
5			concerning confidential and trade secret information
6 7	Ryan Andrade	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
8		Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported trade secrets; Waymo's
9			employee policies concerning confidential and
10			trade secret information
11	Drew Ulrich	Waymo LLC 1600 Amphitheatre Parkway	Inventions disclosed and claimed in the '922 and
12		Mountain View, CA 94043	'464 patents, including conception and reduction to
13			practice; the preparation and filing of the '922 and
14			'464 patents; Waymo's employee policies concerning confidential and
15			trade secret information; the design, development, and
16 17			operation of Waymo's LiDAR systems, self-driving
18			car project, and purported trade secrets
19	Zachary Morris	Waymo LLC 1600 Amphitheatre Parkway	Inventions disclosed and claimed in the '922 and
20		Mountain View, CA 94043	'464 patents, including conception and reduction to
21			practice; the preparation and filing of the '922 and
22			'464 patents; Waymo's employee policies
23			concerning confidential and trade secret information; the design, development, and
24			operation of Waymo's LiDAR systems, self-driving
25			car project, and purported trade secrets
26			

DEFENDANTS' UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S SUPPLEMENTAL INITIAL DISCLOSURES Case No. 3:17-cv-00939-WHA sf-3819936

Persons	Address	Knowledge
Samuel Lenius	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Invention disclosed and claimed in the '936 patent, including conception and reduction to practice; the preparation and filing of the '936 patent; Waymo's employee policies concerning confidential and trade secret information; the design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets
Ionut Dorel Iordache	Waymo LLC 1600 Amphitheatre Parkway	Design, development, and operation of Waymo's
	Mountain View, CA 94043	LiDAR systems, self-driving car project, and purported
		trade secrets; Waymo's employee policies
		concerning confidential and trade secret information
Daniel Chu	Waymo LLC	Estimates and forecasts of
	1600 Amphitheatre Parkway Mountain View, CA 94043	ride-sharing market and Waymo's share of ride-
		sharing market; Waymo's business and strategic plans
		(and plans generally) for the ride-sharing market,
		including projections for revenue generation and profitability
Gerard Dwyer	Waymo LLC	Estimates and forecasts of
	1600 Amphitheatre Parkway Mountain View, CA 94043	ride-sharing market and Waymo's share of ride-
	Would view, Cri y 10 13	sharing market; Waymo's business and strategic plans
		(and plans generally) for the
		ride-sharing market, including projections for
		revenue generation and
		profitability; the costs of developing the technology in
		Waymo's alleged trade secrets

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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Persons	Address	Knowledge
Jennifer Haroon	Waymo LLC	Estimates and forecasts of
	1600 Amphitheatre Parkway	ride-sharing market and Waymo's share of ride-
	Mountain View, CA 94043	sharing market; Waymo's
		business and strategic plans
		(and plans generally) for the
		ride-sharing market, including projections for
		revenue generation and
		profitability; valuations of
T 01:	W	Project Chauffeur Waymo's employee policies
Joanne Chin	Waymo LLC 1600 Amphitheatre Parkway	concerning confidential and
	Mountain View, CA 94043	trade secret information;
	1110 011101111 110111, 0111 9 10 10	Waymo's policies
		surrounding side projects and side businesses; knowledge
		of Waymo employee
		involvement in side projects
		and side businesses,
		including that of Anthony Levandowski; knowledge of
		Google's indemnification
		practices
Gary Brown	Waymo LLC	Waymo's first awareness of alleged trade secret
	1600 Amphitheatre Parkway Mountain View, CA 94043	misappropriation; Waymo's
	Mountain View, CA 94043	forensic investigation into
		alleged misappropriation of
		trade secret misappropriation; Waymo's
		measures to protect the
		security of Waymo's
		confidential documents,
Michael Janosko	Waymo LLC	servers, and SVN repository Waymo's measures to
IVIICIIaci Janusku	1600 Amphitheatre Parkway	protect the security of
	Mountain View, CA 94043	Waymo's confidential
	·	documents, servers, and
		SVN repository; Waymo's employee policies
		concerning confidential and
		trade secret information

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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Persons	Address	Knowledge
Kristinn Gudjonsson	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; Waymo's forensic investigation into alleged misappropriation of trade secret misappropriation
Tim Willis	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's supply chain operations; Waymo's employee policies concerning confidential and trade secret information
Sean Noyce	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's supply chain operations; Waymo's employee policies concerning confidential and trade secret information
Jai Krishnan	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's supply chain operations; Waymo's employee policies concerning confidential and trade secret information
William Grossman	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's knowledge of Defendants' LiDAR design; Waymo's employee policies concerning confidential and trade secret information; Waymo's receipt of correspondence containing Defendants' LiDAR design
Ron Medford	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's filings, submissions, applications, o certifications made to public entities pertaining to its self- driving cars and the use of lasers in autonomous vehicles

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Persons	Address	Knowledge
Waymo Human Resources Manager	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's policies concerning confidential and trade secret information; Waymo employment and compensation issues; Project Chauffeur bonus program
Chelsea Bailey	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's policies concerning confidential and trade secret information; Waymo employment and compensation issues; Proje Chauffeur bonus program
Meiling Tan	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Marketing of Waymo's autonomous vehicle program; Waymo's busines plans; Waymo's strategy regarding its business mode with respect to self-driving car technology; Waymo's partnerships in the self-driving car space; Waymo' business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability
Individuals most knowledgeable about Waymo's business, confidentiality policies, self-driving vehicle program, LiDAR systems, and employment and compensation policies and practices	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Waymo's policies surrounding side projects and side businesse knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; the design, development, and operation of Waymo's LiDAR systems and purported trade secrets

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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1	Persons	Address	Knowledge
2	David Krane	Google Ventures	Development and operation
3		1600 Amphitheatre Parkway	of Waymo's autonomous vehicle program; Anthony
		Mountain View, CA 94043	Levandowski's departure
4			from Waymo; Waymo's policies surrounding side
5			projects and side businesses; knowledge of Waymo employee involvement in
7			side projects and side businesses, including that of
8			Anthony Levandowski; Waymo's business plans;
9			knowledge of discussions with Defendants regarding a partnership with Defendants
10			in the self-driving vehicle/ride-sharing space
11	David Lu	Google Ventures	Development and operation
12		1600 Amphitheatre Parkway	of Waymo's autonomous vehicle program; Anthony
13		Mountain View, CA 94043	Levandowski's departure from Waymo; Waymo's
14			policies surrounding side projects and side businesses; knowledge of Waymo
15			employee involvement in
16			side projects and side businesses, including that of
17			Anthony Levandowski; Waymo's business plans; Waymo's strategy regarding
18			its business model with
19			respect to self-driving car technology; Waymo's
20			business and strategic plans (and plans generally) for the
21			ride-sharing market, including projections for
22			revenue generation and
			profitability; Waymo's partnerships in the self-
23			driving car space; knowledge of discussions with
24			Defendants regarding a partnership with Defendants
25			in the self-driving
26			vehicle/ride-sharing space

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Persons	Address	Knowledge
Larry Page	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side
		projects and side businesses; knowledge of Waymo employee involvement in side projects and side
		businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions
		with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space;
		knowledge of the Project Chauffeur bonus program;
Sergey Brin	Alphabet Inc. 1600 Amphitheatre Parkway	Development and operation of Waymo's autonomous vehicle program; Anthony
	Mountain View, CA 94043	Levandowski's departure from Waymo; Waymo's
		policies surrounding side projects and side businesses; knowledge of Waymo
		employee involvement in side projects and side businesses, including that of Anthony Levandowski
Eric Schmidt	Alphabet Inc.	Development of Waymo's autonomous vehicle
	1600 Amphitheatre Parkway Mountain View, CA 94043	program; Anthony Levandowski's departure from Waymo
David Drummond	Alphabet Inc.	Waymo's knowledge of
	1600 Amphitheatre Parkway Mountain View, CA 94043	Defendants' autonomous vehicle program; knowledge of Waymo's discussions with Defendants regarding a
		partnership with Defendants in the self-driving vehicle/ride-sharing space.

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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1	Persons	Address	Knowledge
2	Chris Urmson	1777 Latham Street	Development and operation
3		Mountain View, CA 94041	of Waymo's autonomous vehicle program; Anthony
4			Levandowski's departure from Waymo; Waymo's employee policies
5			concerning confidential and trade secret information;
6			Waymo's policies surrounding side projects and
7			side businesses; knowledge of Waymo employee
8			involvement in side projects and side businesses,
9			including that of Anthony Levandowski; knowledge of
10			the Project Chauffeur bonus program;
11	Bryan Salesky	Argo AI	Development and operation
12		40 24th Street Pittsburgh, PA 15222	of Waymo's autonomous vehicle program; Anthony
13			Levandowski's departure from Waymo; Waymo's
14			employee policies concerning confidential and trade secret information;
15			Waymo's policies
16			surrounding side projects and side businesses; knowledge
17			of Waymo employee involvement in side projects
18			and side businesses, including that of Anthony Levandowski
19			Levandowski

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

1	Persons	Address	Knowledge
2	Sebastian Thrun	Udacity, Inc. 2465 Latham Street	Development and operation of Waymo's autonomous
3		Mountain View, CA 94040	vehicle program; Anthony Levandowski's departure
5			from Waymo; knowledge of the Project Chauffeur bonus program; Waymo's
$\begin{bmatrix} 3 \\ 6 \end{bmatrix}$			employee policies concerning confidential and
7			trade secret information; Waymo's policies
8			surrounding side projects and side businesses; knowledge of Waymo employee
9			involvement in side projects and side businesses,
10			including that of Anthony Levandowski
11 12	Jiajun Zhu	Nuro, Inc. 435 N Whisman Road, Suite 100	Development and operation of Waymo's autonomous
13		Mountain View, CA 94043	vehicle program; Anthony Levandowski's departure from Waymo; Waymo's
14			employee policies concerning confidential and
15			trade secret information; Waymo's policies
16			surrounding side projects and side businesses; knowledge of Waymo employee
17			involvement in side projects and side businesses,
18 19			including that of Anthony Levandowski
20	Dave Ferguson	Nuro, Inc. 435 N Whisman Road, Suite 100	Development and operation of Waymo's autonomous
21		Mountain View, CA 94043	vehicle program; Anthony Levandowski's departure
22			from Waymo; Waymo's employee policies concerning confidential and
23			trade secret information; Waymo's policies
24			surrounding side projects and side businesses; knowledge
25			of Waymo employee involvement in side projects
26 27			and side businesses, including that of Anthony Levandowski
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Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

	Persons	Address	Knowledge
Ky	yle Vogt	Cruise Automation 201 11th Street San Francisco, CA 94103	Public disclosure of Waymo's purported trade secrets
Ve	mployee of elodyne iDAR, Inc.	5521 Hellyer Avenue San Jose, CA 95138 (408) 465-2800	Public disclosure of Waymo's purported trade secrets
∥ Qı	mployee of uanergy ystems, Inc.	482 Mercury Drive Sunnyvale, CA 94085 (408) 245-9500	Public disclosure of Waymo's purported trade secrets
	mployee of Cepton echnologies, Inc.	103 Bonaventura Drive San Jose, CA 95134	Public disclosure of Waymo's purported trade secrets
	mployee of Innoviz echnologies Ltd.	15 Atir Yeda Street Kfar Saba, Israel 4464312 Email: info@innoviz.tech	Public disclosure of Waymo's purported trade secrets
Li	mployee of uminar echnologies, Inc.	495 Old Spanish Trail Portola Valley, CA 94028	Public disclosure of Waymo's purported trade secrets
	mployee of Toyota lotor Sales, U.S.A., c.	19001 South Western Avenue Department WC11 Torrance, CA 90501 (310) 468-5084	Public disclosure of Waymo's purported trade secrets
Er M	mployee of Ford lotor Company	One American Road Dearborn, MI 48126 (313) 322-3000	Public disclosure of Waymo's purported trade secrets
of	mployee of BMW North America, LC	300 Chestnut Ridge Road Woodcliff Lake, NJ 07677-7731	Public disclosure of Waymo's purported trade secrets
	mployee of eddartech USA Inc.	1209 N. Orange Street Wilmington, DE 19801-1120	Public disclosure of Waymo's purported trade secrets
	mployee of nantom Intelligence ic.	2740, Rue Einstein Québec, QC G1P 4S4 Canada (418) 650-6518	Public disclosure of Waymo's purported trade secrets
Dl In	mployee of ENSO tternational merica	24777 Denso Drive Southfield, MI 48086 (248) 350-7500	Public disclosure of Waymo's purported trade secrets
Ca	mployee of ontinental utomotive, Inc.	18030 MacMillan Park Drive Fort Mill, SC 29707 (704) 583-8710	Public disclosure of Waymo's purported trade secrets

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1	Persons	Address	Knowledge
	- 12 12 12	150 Stephenson Highway	Public disclosure of
2	Employee of Valeo Inc.	Troy, MI 48083	Waymo's purported trade
3		(248) 619-8300	secrets
4	Employee of Suteng Innovation	Robosense Building, Block 1	Public disclosure of
5	Technology Co., Ltd.	South of Zhongguan Honghualing Industrial District	Waymo's purported trade secrets
6		No. 1213 Liuxian Avenue Taoyuan Street, Nanshan District	
7		Shenzhen, China Phone: 400 6325830 / 0755-86325830	
8		Email: Service@sz-sti.com	
9	Employee of Nalux Co., Ltd.	c/o Acme Agent, Inc. 41 S. High Street, Suite 2800	Public disclosure of Waymo's purported trade
10		Columbus, OH 43215	secrets; communications and business transactions with
11			Waymo or Defendants regarding the manufacture of
12			the FAC lens; manufacture, availability, and use of FAC
13	F 1 C	1150 V.C. D. 1 C. 100	lenses
14	Employee of OSRAM Opto	1150 Kifer Road, Suite 100 Sunnyvale, CA 94086	Public disclosure of Waymo's purported trade
15	Semiconductors Inc.		secrets; communications and business transactions with
16			Waymo or Defendants regarding the manufacture of
17			the FAC lens; manufacture, availability, and use of FAC lenses; use and position of
18			laser diodes on printed circuit boards
19	Employee of Gorilla	Gorilla Circuits	Communications and
20	Circuits	c/o CT Corporation	business transactions with Waymo or Defendants
21		818 W. 7th Street, Suite 930 Los Angeles, CA 90017	regarding components for LiDAR sensors;
22			manufacture, availability, and use of such components
23			

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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Address 185 Berry Street, Suite 500 San Francisco, CA 94107 c/o Rogers Joseph O'Donnell 311 California Street, 10th Floor San Francisco, CA	Waymo's business plans; Waymo's strategy regarding its business model with respect to self-driving car technology; Waymo's partnerships in the self- driving car space; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability Representation of Anthony Levandowski; knowledge of Odin Wave LLC, Tyto LiDAR LLC, and Sandstone
c/o Rogers Joseph O'Donnell 311 California Street, 10th Floor	Waymo's strategy regarding its business model with respect to self-driving car technology; Waymo's partnerships in the self-driving car space; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability Representation of Anthony Levandowski; knowledge of Odin Wave LLC, Tyto
311 California Street, 10th Floor	Levandowski; knowledge of Odin Wave LLC, Tyto
	Group LLC; Stroz due diligence for the
Levine & Baker 340 Pine St Suite 300, San Francisco, CA 94104	Uber/Ottomotto acquisition* Representation of Lior Ron; knowledge of Odin Wave LLC, Tyto LiDAR LLC, and Sandstone Group LLC; Stroz due diligence for the Uber/Ottomotto acquisition*
Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	Inspection pursuant to the Court's provisional remedy order
Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	Inspection pursuant to the Court's provisional remedy order
Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	Inspection pursuant to the Court's provisional remedy order
	Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600 Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600 Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600 Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111

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D.	4.33	***
Persons	Address	Knowledge
John McCauley†	Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111	Inspection pursuant to the Court's provisional remedy order
	Phone: (415) 875-6600	
Jared Newton†	Quinn Emanuel Urquhart & Sullivan, LLP	Inspection pursuant to the Court's provisional remedy order
	777 6th Street NW, 11th floor Washington, D.C. 20001 Phone: (202) 538-8000	order
Brian Zajac	[Contact through counsel of record]	Design and development of Defendants' LiDAR,
	Uber Technologies, Inc. Advanced Technologies Center	including test scenarios; Defendants' non- misappropriation of
	100 32nd St, Pittsburgh, PA 15201	Waymo's trade secrets; confirmation of the absence of evidence of trade secret
		misappropriation through and during compliance with the Court's provisional
		remedy order
Sasha Zbrozek	Waymo LLC 1600 Amphitheatre Parkway	Waymo's measures to protect the security of
	Mountain View, CA 94043	Waymo's confidential documents, servers, and
		SVN repository; Waymo's employee policies concerning confidential and
		trade secret information; Waymo's forensic
		investigation into alleged misappropriation of trade secrets
David Lawee	Alphabet Inc.	Knowledge of the Project
	1600 Amphitheatre Parkway Mountain View, CA 94043	Chauffeur bonus program; knowledge of Waymo's acquisition of 510 Systems
		and Anthony's Robots; knowledge of Google's indemnification practices
		indenimication practices

Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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1	D.,	A 1.3	V1-1
1	Persons	Address	Knowledge
2	Nick Vines	Nuro, Inc.	Waymo's measures to protect the security of
3		435 N Whisman Road, Suite 100 Mountain View, CA 94043	Waymo's confidential
		Mountain View, CA 94043	documents, servers, and
4			SVN repository; Waymo's employee policies
5			concerning confidential and
6			trade secret information; Waymo's forensic
7			investigation into alleged misappropriation of trade
/			secrets
8	Nathaniel Fairfield	Waymo LLC	Waymo's measures to
9		1600 Amphitheatre Parkway	protect the security of Waymo's confidential
10		Mountain View, CA 94043	documents, servers, and
			SVN repository; Waymo's employee policies
11			concerning confidential and
12			trade secret information; Waymo's forensic
13			investigation into alleged
1.4			misappropriation of trade secrets; Waymo's knowledge
14			of Odin Wave and Tyto Lidar
15	Andrew Barton	Waymo LLC	Waymo's measures to
16	Sweeney	1600 Amphitheatre Parkway	protect the security of
17		Mountain View, CA 94043	Waymo's confidential documents, servers, and
			SVN repository; Waymo's
18			employee policies concerning confidential and
19			trade secret information;
20			Waymo's forensic investigation into alleged
21			misappropriation of trade secrets; Waymo's knowledge
			of Odin Wave and Tyto
22			Lidar
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Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936

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Persons	Address	Knowledge
Leah Bijnens	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; Waymo's forensic investigation into alleged misappropriation of trade secrets; Waymo's knowledge of Odin Wave and Tyto Lidar
Shawn Bananzadeh	(Waymo LLC) 1600 Amphitheatre Parkway (Mountain View, CA 94043)	Estimates and forecasts of ride-sharing market and Waymo's share of ride-sharing market; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability; the costs of developing the technology in Waymo's alleged trade secrets
Michael Xing	(Waymo LLC) 1600 Amphitheatre Parkway (Mountain View, CA 94043)	Payments made pursuant to the Project Chauffeur Bonus plan; other bonus payments made to Chauffeur/Waymo employees

Defendants believe that Waymo's current and former employees and consultants are likely to have knowledge of: (1) the design and development of Waymo's LiDAR and purported trade secrets, including but not limited to failures to protect the confidentiality of such purported trade secrets; (2) the '922, '464, and '936 patents ("the Asserted Patents"); (3) Waymo's analyses or plans concerning the ride-sharing market, including projections for revenue generation and profitability; (4) Waymo's delay in bringing this lawsuit and motivations for litigating against Defendants; (5) Waymo's practice of allowing competing side businesses; and (6) lack of damages or irreparable harm to Waymo. The identities of all such individuals are known to

Waymo but not to Defendants as of the date of this disclosure.³ Defendants reserve the right to supplement this list as additional facts are disclosed in discovery.

Further, Defendants identify the following persons who may have knowledge of facts relevant to this suit:

- 1. Any custodian of records or other person who may be required to establish authenticity of documents;
- 2. Any and all persons identified by Waymo in its initial disclosures; and
- 3. Any and all persons whose depositions are taken, who provide written testimony in this action, or who contribute to any response to the parties' discovery requests.

Additionally, Defendants have retained and intend to retain expert witnesses to testify on its defenses, including non-misappropriation of Waymo's alleged trade secrets; the culture, customs, and practices in the autonomous vehicle space; non-infringement; invalidity; forensic investigations to locate the allegedly downloaded files; and lack of damages.

B. DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS [Fed. R. Civ. P. 26(a)(1)(A)(ii)]

Defendants identify the following categories of documents, electronically stored information, and tangible things in its possession, custody, or control that it may use to support its defenses, unless solely for impeachment:

- Documents concerning Defendants' autonomous vehicle program;
- Documents concerning Defendants' design and development of LiDAR;
- Documents concerning Defendants' efforts to commercialize autonomous vehicle technology;
- Drawings or photographs of Defendants' LiDAR;

³ As set forth in Defendants' motion to compel (Dkt. 687), Waymo has refused to respond to interrogatories or produce documents fundamental to Defendants' defenses, which Uber needs to proceed with depositions. To date, Waymo has produced only 975 documents in response to Defendants' first and second sets of requests for production, consisting of 162 document requests.

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Defendants' first and second sets of requests for production, consisting of 162 document requests. If and when Waymo fulfills its interrogatory response and document production obligations, Defendants will supplement these disclosures based on information not currently known to Defendants.

1	 Prototypes (or components of prototypes) of Defendants' LiDAR;
2	Documents concerning Defendants' hiring process, including hiring agreements;
3	Documents concerning Uber's acquisition of Ottomotto;
4	• The Asserted Patents, their prosecution histories, and prior art to the Asserted Patents;
5	Documents in the public domain relating to Waymo's purported trade secrets;
6	Documents concerning third-party suppliers of LiDAR components; and
7	Waymo's filings, submissions, applications, or certifications made to public entities
8	pertaining to the use of lasers in autonomous vehicles.
9	To the extent the above-identified documents are within the possession, custody, or
10	control of Defendants, such documents are generally located at Defendants' offices at
11	1455 Market Street, San Francisco, CA 94103.
12	Defendants' search for documents is ongoing, and Defendants reserve the right to
13	supplement this disclosure under Federal Rule of Civil Procedure 26(e)(1). Defendants may also
14	rely on documents produced by any party and third party to this litigation, including Defendants
15	themselves and Waymo.
16	Defendants reserve the right to object to the production of any documents described hereir
17	on any basis permitted by the Federal Rules of Civil Procedure.
18	C. COMPUTATION OF DAMAGES [Fed. R. Civ. P. 26(a)(1)(A)(iii)]
19	Pursuant to Fed. R. Civ. P. 26(a)(1)(C), Defendants may seek attorneys' fees and costs in
20	defending this action, but are unable at this time to estimate the amount.
21	D. INSURANCE AGREEMENTS [Fed. R. Civ. P. 26(a)(1)(A)(iv)]
22	Defendants are currently unaware of any insurance contracts applicable to any claim in
23	this action.
24	CERTIFICATION
25	To the best of my knowledge, information and belief, formed after an inquiry that is
26	reasonable under the circumstances, this disclosure is complete and correct as of the date set forth
27	below.
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Defendants' Uber Technologies, Inc. and Ottomotto LLC's Supplemental Initial Disclosures Case No. 3:17-cv-00939-WHA sf-3819936